

DENTONS US LLP

Tania M. Moyron (admitted *pro hac vice*)
Van C. Durrer (admitted *pro hac vice*)
601 S. Figueroa Street #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Facsimile: (213) 623-9924
Email: tania.moyron@dentons.com
van.durrer@dentons.com

John D. Beck (admitted *pro hac vice*)
Sarah M. Schrag (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020-1089
Telephone: (212) 768-6700
Facsimile: (212) 768-6800
Email: john.beck@dentons.com
sarah.schrag@dentons.com

*Proposed Counsel for Debtors and
Debtors in Possession*

TOGUT, SEGAL & SEGAL LLP

Frank A. Oswald (admitted)
550 Broad Street
Suite 1508
Newark, NJ 07102
Telephone: (212) 594-5000
Facsimile: (212) 967-4258
Email: frankoswald@teamtogut.com

Albert Togut (admitted *pro hac vice*)
Amanda C. Glaubach (admitted *pro hac vice*)
Eitan Blander (admitted *pro hac vice*)
One Penn Plaza, Suite 3335
New York, New York 10119
Telephone: (212) 594-5000
Facsimile: (212) 967-4258
Email: altogut@teamtogut.com
aglaubach@teamtogut.com
eblander@teamtogut.com

*Proposed Counsel for Debtors and
Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:
Powin, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [22495]; and (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

APPLICATION FOR ORDER SHORTENING TIME

Powin, LLC and the above-referenced affiliated debtors and debtors-in-possession (the “Debtors” or the “Applicants”), by their undersigned counsel, request that the time period for responding to the *Motion for Entry of an Order (I) Designating a Stalking Horse Bidder and Approving Stalking Horse Bidder Protections, (II) Approving Bidding Procedures by Which Interested Parties May Bid and an Auction Sale Format in Connection With the Sale of Substantially All of the Debtors’ Assets, (III) Approving Form of Asset Purchase Agreement, (IV) Approving Form of Notice to be Provided to Interested Parties, (V) Authorizing the Assumption and Assignment of Assumed Contracts and Notice Procedures Thereto, (VI) Scheduling a Court Hearing to Consider Approval of the Sale to the Highest and Best Bidder, and (VII) Authorizing the Sale of the Debtors’ Property Free and Clear of All Causes of Action and Claims* [Docket No. 228] (the “Motion”) be shortened pursuant to Fed. R. Bankr. P., 9006(c)(1), for the reason(s) set forth below:

1. The reasons for an expedited sale process for the Debtors was explained by Debtors’ counsel at the June 24, 2025 hearing whereat the Court approved the Debtors’ request for interim DIP financing from the Stalking Horse which included various milestone dates for, among other things, entry of an order approving bid procedures and fixing the dates for the submission of competing offers, an auction and a sale hearing. At that time, the Court set aside time for a hearing on July 15 to consider that portion of the Motion regarding, among other things, the Debtors’ proposed bid and notice procedures. The expedited sale timeline proposed in the Motion was negotiated with the proposed Stalking Horse Bidder and is necessary given the Debtors’ ongoing liquidity issues. The sale timeline will also enable the Debtors to solicit bids on a potential sale transaction to maximize the value of their Assets. To keep on track with the proposed sale timeline,

and to remain in compliance with the terms of the approved financing, a hearing on the Motion must be held on or before July 15, 2025, which is a previously scheduled omnibus hearing date in this case. The Debtors also note that the Motion has already been served on interested parties.

2. The Debtors herein seek to confirm the July 15 hearing and also request that the Court set a July 11, 2025, at 4:00 p.m. (prevailing Eastern Time) as the deadline to file any objection to the Motion.

3. The reduction of the time period is not prohibited under Fed. R. Bankr. P. 9006(c)(1). The Debtors request entry of the proposed order shortening time and propose to serve the order once entered on interested parties by e-mail or, where no e-mail address is available, by first-class mail.

[Signature page to follow]

Dated: July 2, 2025

TOGUT, SEGAL & SEGAL LLP

/s/ Frank A. Oswald

Frank A. Oswald (admitted)
550 Broad Street
Suite 1508
Newark, NJ 07102
Telephone: (212) 594-5000
Facsimile: (212) 967-4258
Email: frankoswald@teamtogut.com

Albert Togut (admitted *pro hac vice*)
Amanda C. Glaubach (admitted *pro hac vice*)
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One Penn Plaza, Suite 3335
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Facsimile: (213) 623-9924
Email: tania.moyron@dentons.com
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